

Principal Financial Group®



Principal Financial Group Political Action Committee

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May 12, 2003

Antoinette Kitchen
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

RE: Identification Number C00128918
30 Day Post-General Report (10/17/02 – 11/25/02)

Dear Ms. Warger:

This is in response to your letter of April 11, 2003 concerning a candidate contribution made which exceeded the \$5,000 aggregate contribution limit set forth in the Act, 2 U.S.C. §441a(a). Specifically at issue is a \$500 contribution made to the Nussle For Congress Committee on October 17, 2002.

In accordance with your April 29, 2003 phone call with Jill Kempkes in our Government Relations department, we have sent a written request to the campaign committee of Representative Nussle to refund this \$500 contribution amount to us. A copy of this request is enclosed. After receipt of this refund, we will disclose the refunded contribution on Schedule A supporting line 16 of the appropriate FEC report.

Our failure to properly designate this contribution was an oversight. As mentioned in our January 28, 2003 letter to you, we have implemented stricter audit procedures and are confident these procedures will enable us to ensure all future contributions are properly allocated and remain within permitted limits.

Please let us know if you have any additional questions or concerns with regard to this matter. Thank you.

Sincerely,

Scott Fiene
PrinPac Treasurer
515-248-2146

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Enclosure

PrinPac Treasurer, Government Relations Department
Principal Financial Group®
One Madison, 54.00824675 515-252-2711

Principal Financial Group®



Principal Life Insurance Company Political Action Committee

May 12, 2003

Nussle For Congress Committee
 Attn: Tammy Werger
 P. O. Box 324
 Manchester, IA 52057

RE: 10/17/2002 Campaign Contribution

Dear Ms. Werger:

As a follow-up to your phone conversation with Jill Kempkes in our Government Relations department, the Federal Election Commission notified PrinPac, the PAC of Principal Life Insurance Company, that during 2002, PrinPac exceeded the contribution limit of \$5,000 per election. Specifically, the Commission is concerned with the October 17, 2002 contribution of \$500 made by PrinPac to the Nussle Committee.

You'll recall that on January 3, 2003, PrinPac requested to you that this \$500 contribution be redesignated from a General Election contribution to a Primary Election contribution. The Commission has noted this redesignation, but has stated that the contribution may not be redesignated as requested, as the request for redesignation must be made within 60 days of the candidate committee treasurer's receipt of our contribution. 11CFR § 110.2(b).

As directed by the FEC and as discussed with Jill, please refund this \$500 contribution amount to us at your earliest convenience. We apologize for any inconvenience this may cause and are confident our newly revised audit procedures will ensure proper designations in the future. Thank you very much for your assistance in this matter.

Sincerely,

Scott Fiene
 PrinPac Treasurer
 515-248-2146

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